

Port State Measures Agreement and Implementation: Best Practices in Thailand



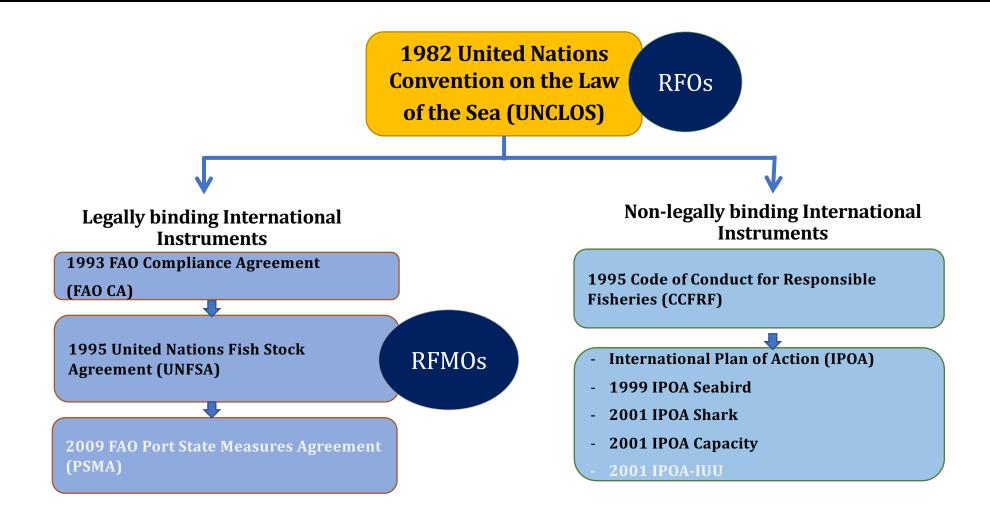
Outlines



	1	Overview of International Instruments regarding IUU Fishing				
	2	PSMA Implementation in Thailand				
Ĉ	3	Successful cases				
	4 /c	hallenges				

1. The overview of international Instruments





UNCLOS ANNEX I. HIGHLY MIGRATORY SPECIES



- 1. Albacore tuna: Thunnus alalunga.
- 2. Bluefin tuna: Thunnus thynnus.
- 3. Bigeye tuna: Thunnus obesus.
- 4. Skipjack tuna: *Katsuwonus pelamis*.
- 5. Yellowfin tuna: Thunnus albacares.
- 6. Blackfin tuna: Thunnus atlanticus.
- 7. Little tuna: Euthynnus alletteratus; Euthynnus affinis.
- 8. Southern bluefin tuna: Thunnus maccoyii.
- 9. Frigate mackerel: Auxis thazard; Auxis rochei.
- 10. Pomfrets: Family Bramidae.

- 11. Marlins: Tetrapturus angustirostris; Tetrapturus belone; Tetrapturus pfluegeri; Tetrapturus albidus; Tetrapturus audax; Tetrapturus georgei; Makaira mazara; Makaira indica; Makaira nigricans.
- 12. Sail-fishes: *Istiophorus platypterus*; *Istiophorus albicans*.
- 13. Swordfish: Xiphias gladius.
- 14. Sauries: Scomberesox saurus; Cololabis saira; Cololabis adocetus; Scomberesox saurus scombroides.
- 15. Dolphin: Coryphaena hippurus; Coryphaena equiselis.
- 16. Oceanic sharks: *Hexanchus griseus; Cetorhinus maximus;* Family *Alopiidae; Rhincodon typus;* Family *Carcharhinidae;* Family *Sphyrnidae;* Family *Isurida*.
- 17. Cetaceans: Family *Physeteridae*; Family *Balaenopteridae*; Family *Balaenidae*; Family *Eschrichtiidae*; Family *Monodontidae*; Family *Ziphiidae*; Family *Delphinidae*.

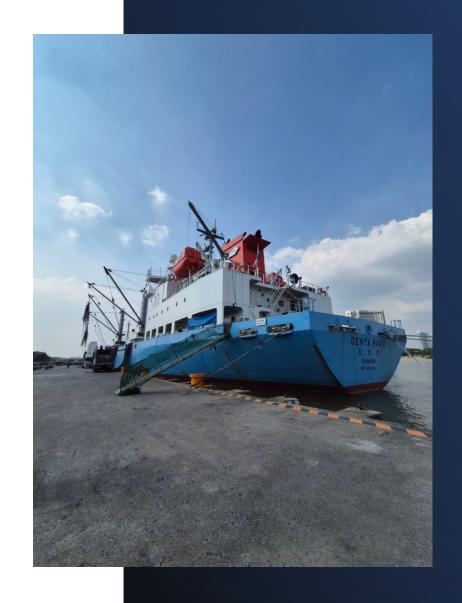
UNCLOS and PSMA

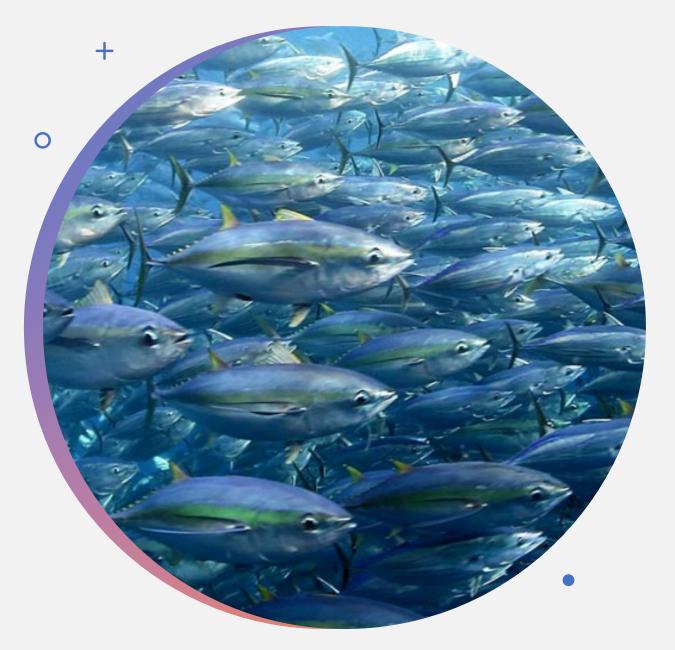
Article 11 Ports

For the purpose of delimiting the territorial sea, the outermost permanent harbour works which form an integral part of the harbour system are regarded as forming part of the coast. Offshore installations and artificial islands shall not be considered as permanent harbour works.

Article 218 Enforcement by port States

2. No proceedings pursuant to paragraph 1 shall be instituted in respect of a discharge violation in the internal waters, territorial sea or exclusive economic zone of another State unless requested by that State, the flag State, or a State damaged or threatened by the discharge violation, or unless the violation has caused or is likely to cause pollution in the internal waters, territorial sea or exclusive economic zone of the State instituting the proceedings.





UNFSA and **PSMA**

In 2006, The "ports of convenience" was raised up in the 2006 session of the 1995 UN Fish Stocks Agreement (UNFSA) Review Conference.

The Parties to UNFSA believed that the Port State is able to play an important role as the frontline to support Flag State to control the operation of their Flag vessels in conformity of international law.



UNFSA and RFMOs

Development of PSMA



- The process of the development of Port State Measures continued on draft a legally binding instrument on Port State Measures in September 2007 by FAO Expert Consultation. This legally binding instrument was in accordance with the IPOA-IUU and the 2005 FAO Model Scheme which is drafted by experts.
- The last draft of the draft legally binding Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing was approved on November 22, 2009
- PSMA fully entered to enforce on 5 June 2019 (International Day for the Fight Against Illegal, Unreported and Unregulated Fishing or IUU DAY)



What is PSMA?



Agreement on Port State Measures (PSMA)

- Agreement on Port State Measures (PSMA) is under the umbrella of UNCLOS
- The first international instrument aims to prevent deter and Eliminated Illegal Unreported and Unregulated Fishing (IUU Fishing)
- Increasing cost for the vessel and their products related to IUU Fishing
- Supporting flag States Responsibility for the enforcement of IUU vessel
- Extending the global communication on IUU Fishing



The current Parties total 78 States and 1 European Union = 79 Parties

PSMA parties

Bangladesh

Indonesia

Maldives

Sri Lanka

Thailand

Non PSMA Parties

but comply with

IOTC Resolution

10/11 and 10/16

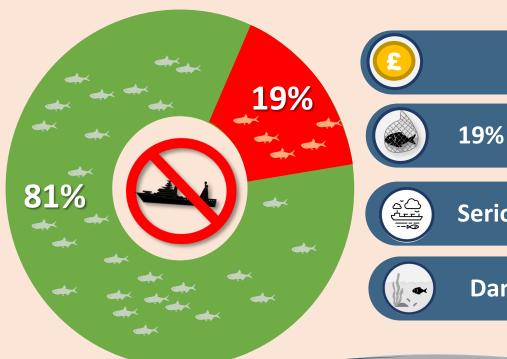
India

Malaysia



IUU fishing





~£ 10 Billion every year

19% of worldwide reported of catch

Serious threat to sustainable fishing

Damages the marine environment

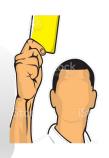
European Union (2021)



2. PSMA Implementation in Thailand



Yellow Card From EU in 2014



Sustainable use of living marine resources and marine ecosystems

Adherence with International Instruments



Established national Policies and Plan for Tackling IUU

- **●** Thailand NPOA-IUU
- Marine FisheriesManagement Plan (FMP)
- Royal ordinance on Fisheries A.D. 2015 and it amendment A.D. 2017
- Sub-ordination Law
- IUU Free ThailandPolicy

Accession to be PSMA Parties

- Accession to bePSMA Parties in May2019
- Established mechanisms for PSMA implementation

Sustainability Responsibility and Creditability

- SDGs
- International Instruments including voluntary and legallybinding
- Traceability System
- Market-basedMeasures



2.1
Development
of PSMA
Implementati
on in Thailand

Oct 2014	Pilot Project with FAO at Phuket Port
Oct 2015	Voluntary Implemented of PSMA
Nov 2015	Established Royal Ordinance on Fisheries A.D. 2015
Jan 2016	Established 1) Designated Ports for foreign-flagged vessels, 2) Period for submit Advance Request For Port Entry (AREP), 3) AREP form, 4) Required documents
May 2016	Accession to be PSMA Party
May 2017	Enforced to apply Thailand e-PSM system
Jun 2017	Amended Royal Ordinance on Fisheries A.D. 2015 and Established Royal Ordinance on Fisheries A.D. 2017
Jun 2018	Fully Enforced to apply Electronic Traceability System known as PSM linked and Processing Statement System (PPS)
Jun 2021	Amended 1) Designated Ports for foreign-flagged vessels, 2) Period for submit Advance Request For Port Entry (AREP), 3) AREP form, 4) Required documents
May 2022	Applied PSMART Platform to be tool for investigation and analysis vessel behavior by AIS system

2.2 The 4 key Mechanisms of Thailand to implement PSMA





Policies and Legal Framework



Monitoring Control and Surveillances (MCS)
Scheme



Electronic Traceability System for imported fish and fishery products



Cooperation with interagencies, third countries, RFMOs and international Organizations





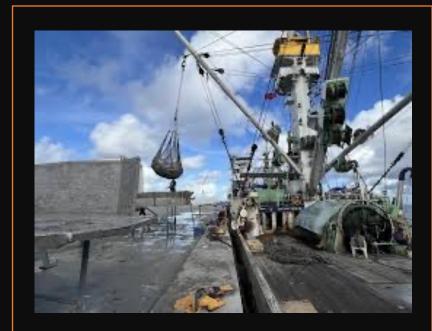
Article 1 Use of terms





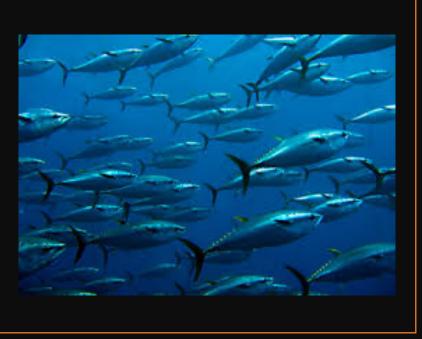
Main Definitions

- (e) "illegal, unreported and unregulated fishing" refers to the activities set out in paragraph 3 of the 2001 FAO International Plan of Action to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing, hereinafter referred to as 'IUU fishing';
- (g) "port" includes offshore terminals and other installations for landing, transshipping, packaging, processing, refuelling or resupplying;
- (j) "vessel" means any vessel, ship of another type or boat used for, equipped to be used for, or intended to be used for, fishing or fishing related activities.



Article 2 Objective

The objective of this Agreement is to prevent, deter and eliminate IUU fishing through the implementation of effective port State measures, and thereby to ensure the long-term conservation and sustainable use of living marine resources and marine ecosystems.







Article 3 Application

Each Party shall, in its capacity as a port State, apply this Agreement in respect of vessels not entitled to fly its flag that are seeking entry to its ports or are in one of its ports, except for:

- vessels of a neighboring State that are engaged in artisanal fishing for subsistence, provided that the port State and the flag State cooperate to ensure that such vessels do not engage in IUU fishing or fishing related activities in support of such fishing; and
- container vessels that are not carrying fish or, if carrying fish, only fish that have been previously landed, provided that there are no clear grounds for suspecting that such vessels have engaged in fishing related activities in support of IUU fishing.











Thailand PSMA Implementation Article 3

- 1. Neighboring State artisanal vessels
- Bilateral cooperation such as cooperation with Cambodia and Myanmar
- Control by section 97 of Royal Ordinance on Fisheries
- 2. Container vessel and it catches
- Control by section 92 of Royal Ordinance on Fisheries (Only Import control)
- Request documents to confirm legality and landing

Article 4 Relationship with international law and other international instruments

Nothing in this Agreement shall prejudice the rights, jurisdiction and duties of Parties under international law. In particular, nothing in this Agreement shall be construed to affect:

- (a) the sovereignty of Parties over their internal, archipelagic and territorial waters or their sovereign rights over their continental shelf and in their exclusive economic zones;
- (b) the exercise by Parties of their sovereignty over ports in their territory in accordance with international law, including their right to deny entry thereto as well as to adopt more stringent port State measures than those provided for in this Agreement, including such measures adopted pursuant to a decision of a regional fisheries management organization.



Thailand PSMA Implementation

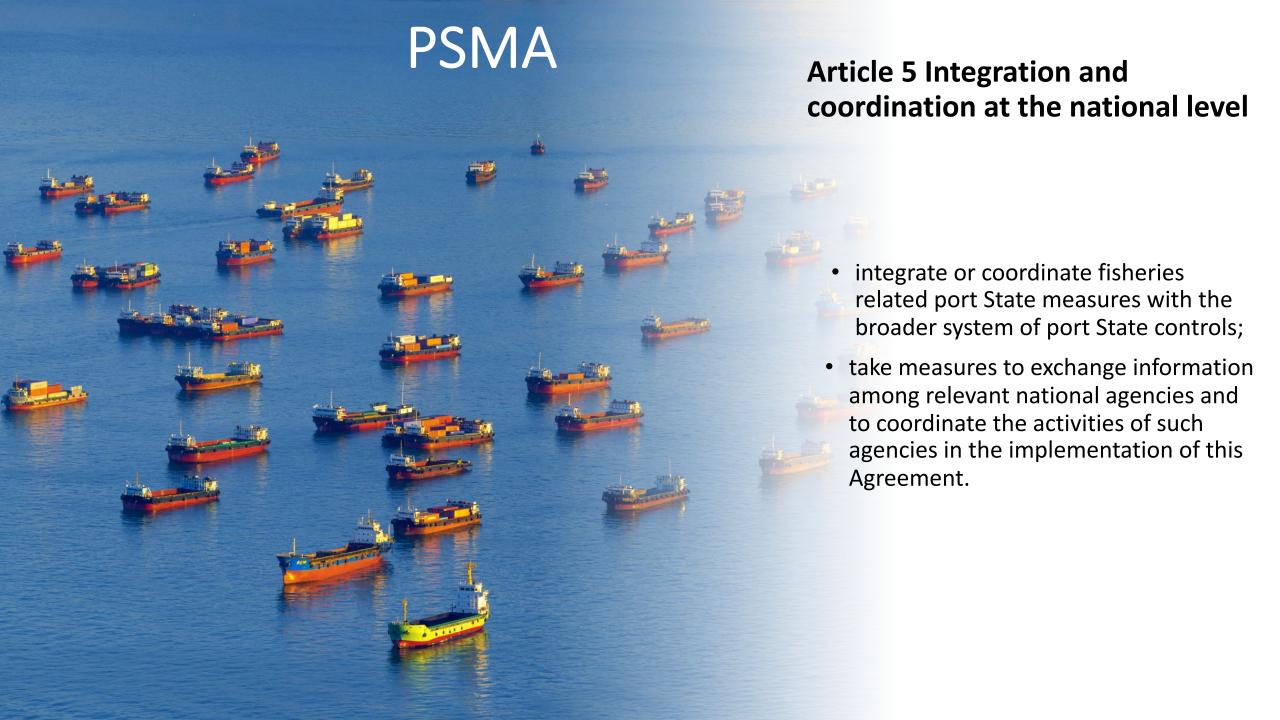
Article 4 Relationship with international law and other international Instruments

Established national Policies and Plan for Tackling IUU

- Thailand NPOA-IUU
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- Sub-ordination Law
- IUU Free Thailand Policy







Thailand PSMA Implementation

Article 5 Enhance cooperation with inter-agencies



Thai Maritime Enforcement Command Center



Royal Thai Navy

Department of Fisheries



Marine and Coastal Resources Department



Department of Labour Protection and Welfare



Marine Department



Marine Police



Customs Department

National
Maritime
Interests
Protection Act
B.E. 2562
(2019)



พระราชบัญญัติ การรักษาผลประโยชน์ ของชาติทางทะเล พ.ศ. ๒๕๖๒

NATIONAL MARITIME
INTERESTS PROTECTION ACT
B.E. 2562 (2019)

สำนักงานสภาความมั่นคงแห่งชาติ

National information systems (FS) Regional e-PSM Systems Data / information systems (FS) Regional e-PSM Systems Data / information systems (FS) Data / information systems (FS)

PSMA

Article 6 Cooperation and exchange of information

- Parties shall cooperate and exchange information with relevant States, FAO, other international organizations and regional fisheries management organizations, including on the measures adopted by such regional fisheries management organizations in relation to the objective of this Agreement.
- Parties shall cooperate, at the subregional, regional and global levels, in the effective implementation of this Agreement including, where appropriate, through FAO or regional fisheries management organizations and arrangements.







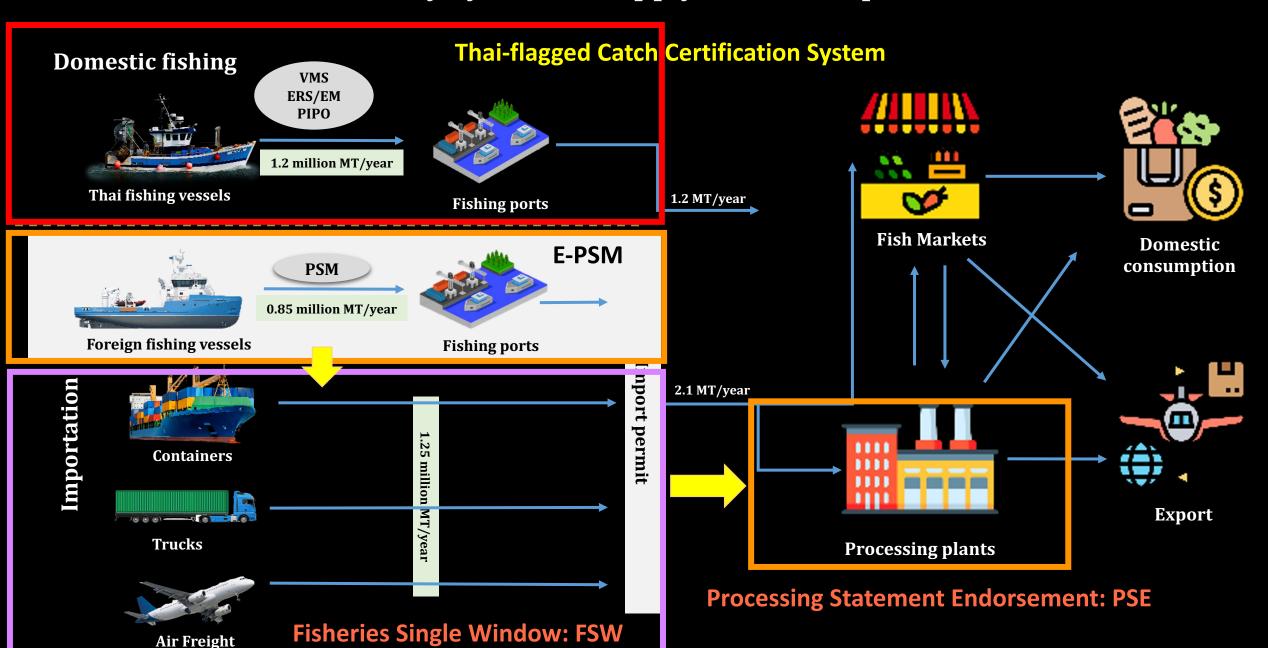
Thailand PSMA Implementation

Article 6 Cooperation and exchange of information

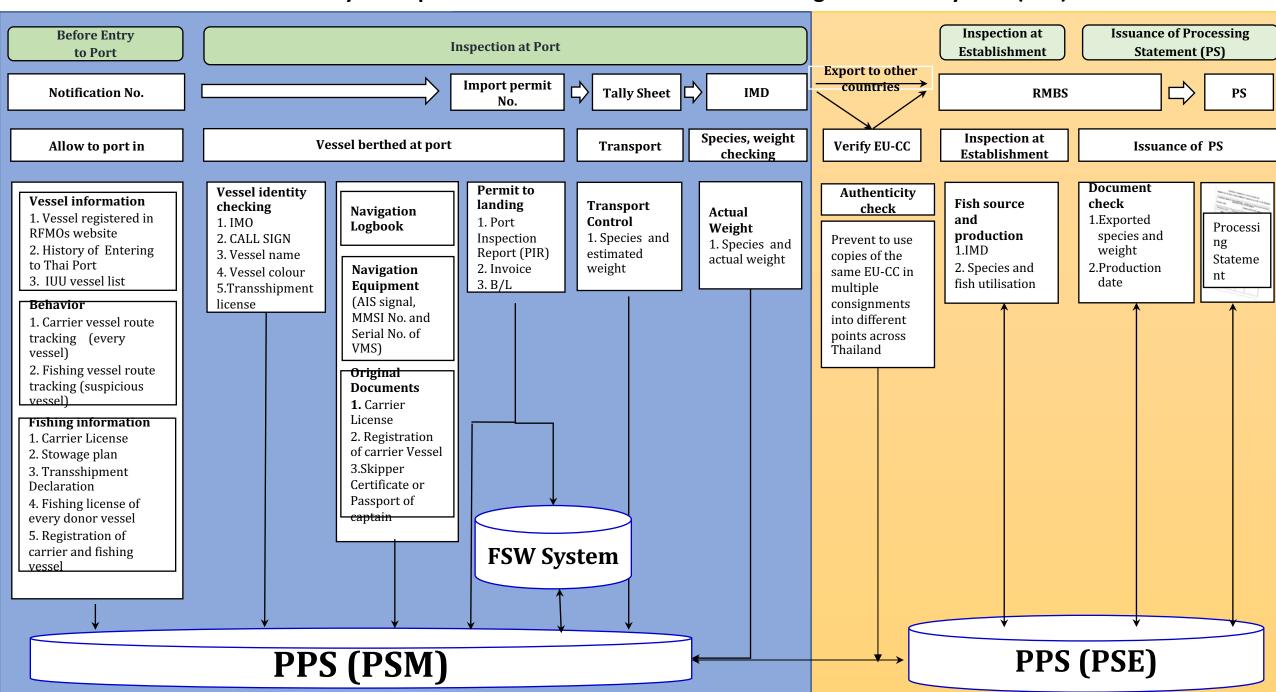
- National: PSM Linked Processing Statement System (PPS)
- Regional: IOTC e-PSM, RFVR
- International: Global Information Exchange System and Global Record



2.2.3 Electronic Traceability System in Supply Chain of Aquatic Animals in Thailand



Traceability on Imported Fish under PSM Linked Processing Statement System (PPS)





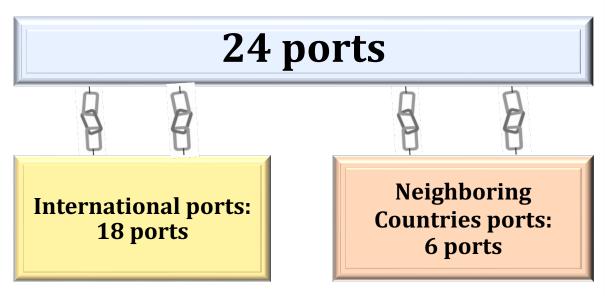
Article 7 Designated port

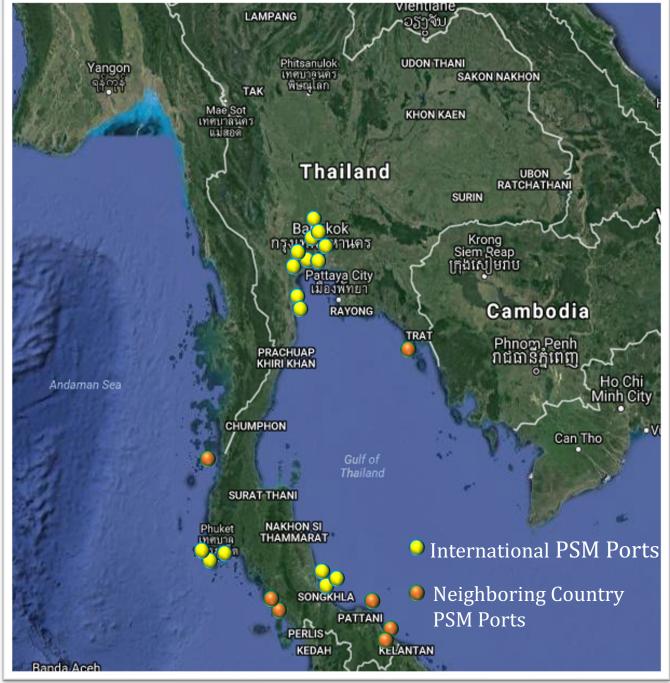
- Each Party shall designate and publicize the ports to which vessels may request entry pursuant to this Agreement. Each Party shall provide a list of its designated ports to FAO, which shall give it due due publicity.
- Each Party shall, to the greatest extent possible, ensure that every port designated and publicized in accordance with paragraph 1 of this Article has sufficient capacity to conduct inspections pursuant to this Agreement.



Designated Ports

- Article 95 of Royal Ordinance on Fisheries B.E. 2558 (2015) and its amendment regulates that the foreign-flagged vessel shall enter to designated ports by announcing through Ministry Notification.
- Currently, we have announced 24 designated ports





Article 8 Advance request for port entry

- Each Party shall require, as a minimum standard, the information requested in Annex A to be provided before granting entry to a vessel to its port.
- Each Party shall require the information referred to in paragraph 1 of this Article to be provided sufficiently in advance to allow adequate time for the port State to examine such information.



Information to be provided in advance by vessels requesting port entry

1. Inte	nded	port o	f call										
2. Port	State	,											
3. Esti	mated	date	and tin	ne (of arrival								
4. Purj	pose(s)											
5. Port	and o	date of	last p	ort	call								
6. Nan	ne of t	he ves	sel										
7. Flag	State	,											
8. Typ	e of v	essel											
9. Inte	rnatio	nal R	adio C	all S	Sign								
10. Ves	ssel co	ntact	inform	ati	on								
11. Ve	ssel ov	wner(s)										
12. Ce	rtifica	te of r	egistry	ID)								
13. IM	O shi	p ID, i	f avail:	able	e								
14. Ext	ternal	ID, if	availa	ble									
15. RF	моі	D, if a	pplical	ble									
16. VN	16. VMS No			,	Yes: National			Yes: R	FMO((s)	Type:		
17. Ve	ssel di	mensi	ons		Length				Beam			Draft	
18. Ve	ssel m	aster	name a	nd	nationality	7							
19. Rel	levant	fishir	g auth	ori	zation(s)								
Identifier Issued by			Validity		Fishing area(s)			Spe	cies		Gear		
20. Rel	levant	trans	shipmo	ent	authorizat	ion(s))						
Identifier Issued by							Validity			ity			
Identifier Issued by						Valid			dity				
21. Tra	ansshi	pmen	t infor	nat	tion concer	ning	donor ve	ssels	6				
Date	Loca	cation Nam		e	Flag State		ID number	Species		Prod for		Catch area	Quantity

Thurs 1	ADVANCE REQUEST FOR PORT ENTRY (แบบคำร้องขอนำเรือประมงต่างประเทศเข้าเทียบท่า)								
3. Submit to (ยื่นคำขอต่อ)								4. Application Date (วันที่เขียนคำขอ)	
								5. Vessel Type (ประเภทเรือ)	
6. Vessel Name (ชื่อเรื่อ)							7. Fla	State (รัฐเจ้าของธง)	
8. Length (ความยาว)/M (เมตร)	มตร) 9. Beam (ความกว้าง)/M (เมตร) 10. Dra					า)/ M (เมตร)	11. Si	ze (ขนาดเรือ)/GT (ตันกรอส)	
12. Last Port (ท่าเรือที่จอดครั้งสุด	L ท้าย), Last Port	State (รัฐเจ้าของท่า	ที่จอดครั้งล	ุเดท้าย)	13. Date of	Last Po	ort (วันที่จอดครั้งสุดท้าย)	
14. Intended Port (ท่าเรือที่ต้องเ	15. Port State (รัฐเจ้า			ง้าของท ่ า)	16. Estimate	ed Date	e - Time Arrival (วัน-เวลาที่คาตว่าจะถึง)		
17. Purpose(s) (วัตถุประสงค์)	1	18. Have Products (มีสินค้า) No (ไม่มี) Yes (มี)			19. Offloading (ขนถ่ายสัตว์น้ำ) No (ไม่ขนถ่าย) Yes (ขนถ่าย)			20. Port after Inspection (ท่าหลังตรวจเรือ)	

Unofficial translation –



Notification of Ministry of Agriculture and Cooperatives
On Advance Data Reporting, and Determining Ports for Non-Thai fishing vessel wishing
to enter the Kingdom
B.E. 2560 (A.D. 2017)

In accordance with the Notification of Ministry of Agriculture and Cooperatives on Advance Data Reporting, and Determining Ports for non-Thai fishing vessel wishing to land aquatic animals or aquatic animal products into the Kingdom B.E. 2559 (A.D. 2016) and the amendment by virtue of section 95 of Royal Ordinance on Fisheries B.E. 2558 (A.D. 2015). As section 29 of the Royal Ordinance on Fisheries (No.2) B.E. 2560 (A.D. 2017) repeals section 95 of the Royal Ordinance on Fisheries B.E. 2558 (A.D. 2015) and be substituted by section 29 under the Royal Ordinance on Fisheries (No.2) B.E. 2560 (A.D. 2017). In addition, to increase the efficiency of non-Thai fishing vessel inspection and

Notification of Ministry of Agriculture and Cooperatives On Advance Data Reporting, and Determining Ports for Non-Thai fishing vessel wishing to enter the Kingdom B.E. 2560 (A.D. 2017) under section 95 of Royal Ordinance on Fisheries No. 2 B.E. 2558 (A.D. 2015) which is amended by the Royal Ordinance on Fisheries (No.2) B.E. 2560 (A.D. 2017)

Article 9 Port entry, authorization or denial

- After receiving the relevant information required pursuant to Article 8, as well as such other information as it may require to determine whether the vessel requesting entry into its port has engaged in IUU fishing or fishing related activities in support of such fishing, each Party shall decide whether to authorize or deny the entry of the vessel into its port and shall communicate this decision to the vessel or to its representative.
- In the case of <u>denial of entry, each Party shall communicate</u> its decision taken pursuant to paragraph 1 of this Article to the <u>flag State of the vessel and</u>, as appropriate and to the extent possible, <u>relevant coastal States</u>, <u>regional fisheries</u> management organizations and other international <u>organizations</u>.
- Notwithstanding paragraphs 3 and 4 of this Article, a <u>Party</u> may allow entry into its ports of a vessel referred to in those paragraphs exclusively for the purpose of inspecting it and taking other appropriate actions in conformity with international law which are at least as effective as denial of port entry in preventing, deterring and eliminating IUU fishing and fishing related activities in support of such fishing.



Port State Measures Procedures





1. Before port entry



2. Vessel inspection at port



3. Offloading control





DOF checks AREP and requested documents

Behavior risk based



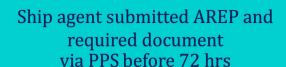
Profile risk

based

DOF analyzes vessel behavior through the PSMART and other tools for risk assessment



DOF issues **NOTI**



Marine Department



Customs Department

Ship agent









DOF sends **NOTI via PPS**





Royal Ordinance of **Fisheries Section 94** 95 and 97

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NOTI

Risk Assessment

1) Profile Risk Based

2) Behavior Risk Based



Profile based



RFMOs list

IMO number

Recent change of vessel flag or ownership

History of suspected or IUU of vessel and owner

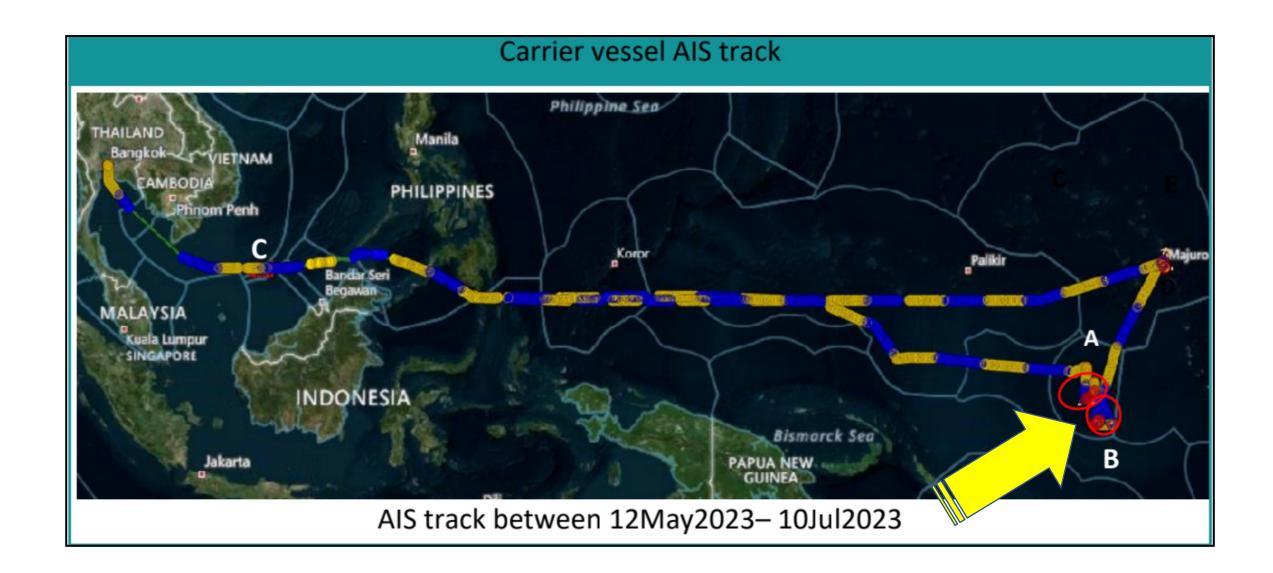
First time coming Thailand





Behavior based by AIS Tracking via PSMART





PSMA

Article 10 Force majeure or distress

Nothing in this Agreement affects the entry of vessels to port in accordance with international law for reasons of force
majeure or distress or prevents a port
State from permitting entry into port to
a vessel exclusively for the purpose
of rendering assistance to persons, ships
or aircraft in danger or distress.



PSMA

Article 11 Use of ports

Where a vessel has entered one of its ports, a Party shall deny, pursuant to its laws and regulations and consistent with international law, including this Agreement, that vessel the use of the port for landing, transshipping, packaging and processing of fish that have not been previously landed and for other port services, including, inter alia, refuelling and resupplying, maintenance and drydocking, if:

- the vessel <u>does not have a valid and applicable authorization to engage in fishing or fishing related activities required by its flag State;</u>
- the vessel does <u>not have a valid and applicable authorization to</u> <u>engage in fishing or fishing related activities required by a coastal</u> <u>State in respect of areas under the national jurisdiction of that State;</u>
- the Party <u>receives clear evidence that the fish on board was taken in</u> <u>contravention of applicable requirements of a coastal State in</u> <u>respect of areas under the national jurisdiction of that State;</u>
- the <u>flag State does not confirm within a reasonable period of time</u>, on the request of the port State, that the fish on board was taken in accordance with applicable requirements of a relevant regional fisheries management organization taking into due account paragraphs 2 and 3 of Article 4; or
- in the case of provision of personnel, fuel, gear and other supplies at sea, that the vessel that was provisioned was not, at the time of provisioning, a vessel referred to in paragraph 4 of Article 9.





LAW

Royal Ordinance of Fisheries

Section 96

and 102 (4)

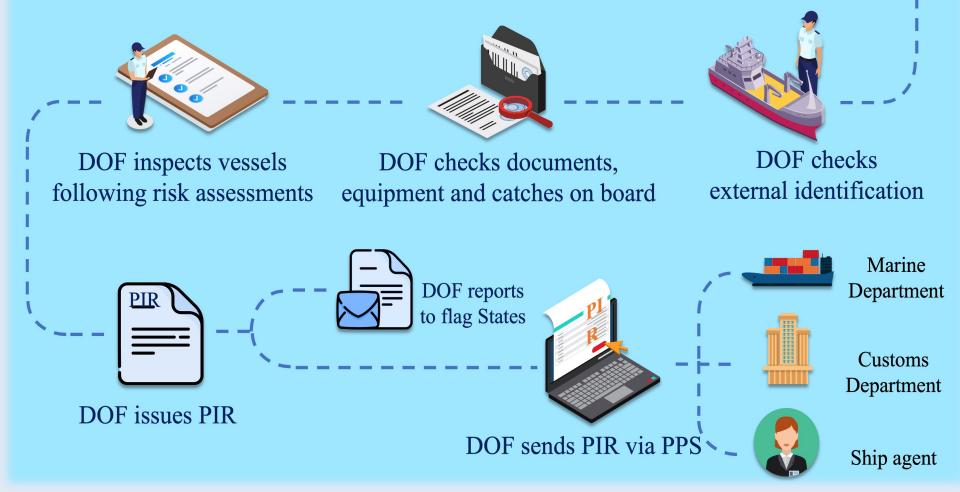


Port Inspection Report (PIR)



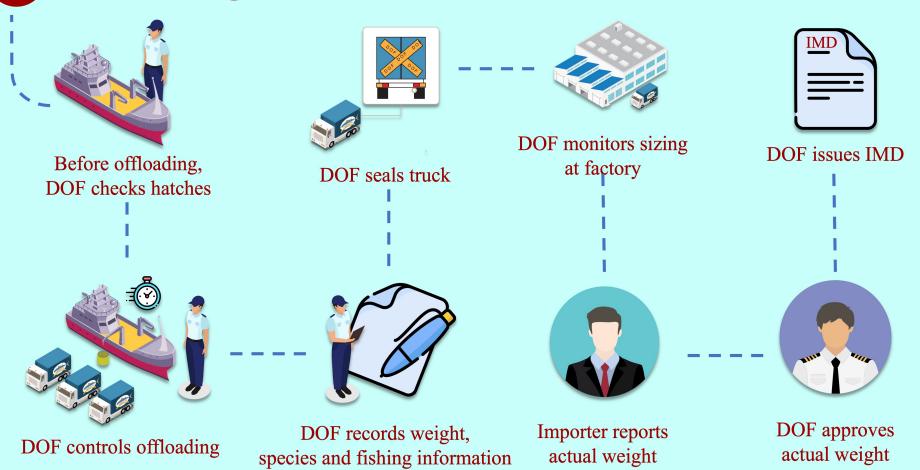
Vessel inspection at port



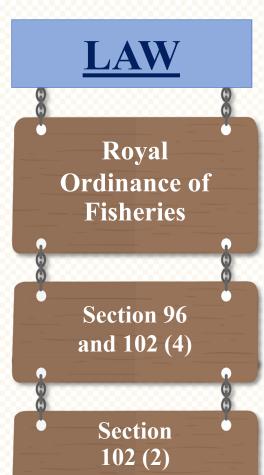




Offloading control







PSMA (INSPECTIONS AND FOLLOW-UP ACTIONS)

Article 12 Levels and priorities for inspection

-shall inspect the number of vessels in its ports required to reach an annual level of inspections sufficient to achieve the objective of this Agreement.

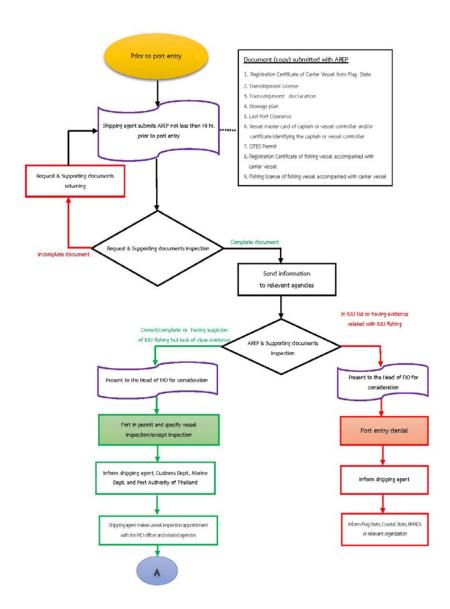
-shall give priority to: (a) (b) (c) vessels that have been denied entry or use of a port in accordance with this Agreement; requests from other relevant Parties, States or regional fisheries management organizations that particular vessels be inspected, particularly where such requests are supported by evidence of IUU fishing or fishing related activities in support of such fishing by the vessel in question; and other vessels for which there are clear grounds for suspecting that they have engaged in IUU fishing or fishing related activities in support of such fishing.

Article 13 Conduct of inspections

Each Party shall ensure that its inspectors carry out the functions set forth in Annex B as a minimum standard.



SOP For Control And Inspection



PSMA (INSPECTIONS AND FOLLOW-UP ACTIONS)

ANNEX C

Report of the results of the inspection

Article 14 Results of inspections

Each Party shall, as a minimum standard, include the information set out in Annex C in the written report of the results of each inspection.

Article 15 Transmittal of inspection results

Each Party shall transmit the results of each inspection to the flag State of the inspected vessel and, as appropriate, to:

those States for which there is evidence through inspection that the vessel has engaged in IUU fishing or fishing related activities in support of such fishing within waters under their national jurisdiction and vessel's master is a national

relevant regional fisheries management organizations (RFMOs)

FAO and other relevant international organizations

Article 16 Electronic exchange of information

Each Party shall designate an authority that shall act as a contact point for the exchange of information under this Agreement. Each Party shall notify the pertinent designation to FAO (GIES)

1. Inspection report no					2. Port	State				
3. Inspecting aut	hority									
4. Name of principal inspector			ID							
5. Port of inspect	ion									
6. Commencement of inspection			YYYY	,	MM		DD	HH		
7. Completion of inspection			YYYY		MM		DD H			
8. Advanced noti	fication re	ceived			Yes		No			
9. Purpose(s)	LAN	TRX	PR	0	OTH (specify)					
10. Port and Sta of last port call	ate and da	te				YYYY	MM	DD		
11. Vessel name										
12. Flag State										
13. Type of vesse	ı									
14. International	Radio Cal	l Sign								
15. Certificate of	registry II)								
16. IMO ship ID,	, if availabl	le								
17. External ID ,	if available	e								
18. Port of regist	ry									
19. Vessel owner	(s)									
20. Vessel bene known and diff owner										
21. Vessel operat from vessel owne		ferent								
22. Vessel master	r name and	nation	nality							
23. Fishing maste	er name an	d natio	onality							
24. Vessel agent										
25. VMS	No	Ye	es: National	1	es: RF	MOs	Type:			
26. Status in RFN undertaken, inch	MO areas v uding any l	vhere f IUU ve	ishing or fis	shing	relateo	d activities	have be	en		
Vessel identifier	RFMO	F	lag State status	Ves	ssel on o vesse	uuthorized l list		on IUU sel list		
		\perp								
	I	- 1		I			1			

Operationalization of FAO Global Information Exchange System (GIES)



- Thailand has reported 160 Port Inspection Reports (PIR) through GIES since 18 December 2023
- Thailand received technical support from FAO for assessment of GIES Connection with National System

ANNEX E

Guidelines for the training of inspectors

Elements of a training programme for port State inspectors should include at least the following areas:

- Ethics;
- Health, safety and security issues;
- Applicable national laws and regulations, areas of competence and conservation and management measures of relevant RFMOs, and applicable international law;
- Collection, evaluation and preservation of evidence;
- 5. General inspection procedures such as report writing and interview techniques;
- Analysis of information, such as logbooks, electronic documentation and vessel history (name, ownership and flag State), required for the validation of information given by the master of the vessel;
- Vessel boarding and inspection, including hold inspections and calculation of vessel hold volumes;
- Verification and validation of information related to landings, transshipments, processing and fish remaining onboard, including utilizing conversion factors for the various species and products;
- 9. Identification of fish species, and the measurement of length and other biological parameters;
- Identification of vessels and gear, and techniques for the inspection and measurement of gear;
- 11. Equipment and operation of VMS and other electronic tracking systems; and
- 12. Actions to be taken following an inspection.

PSMA (INSPECTIONS AND FOLLOW-UP ACTIONS)

Article 17 Training of inspectors

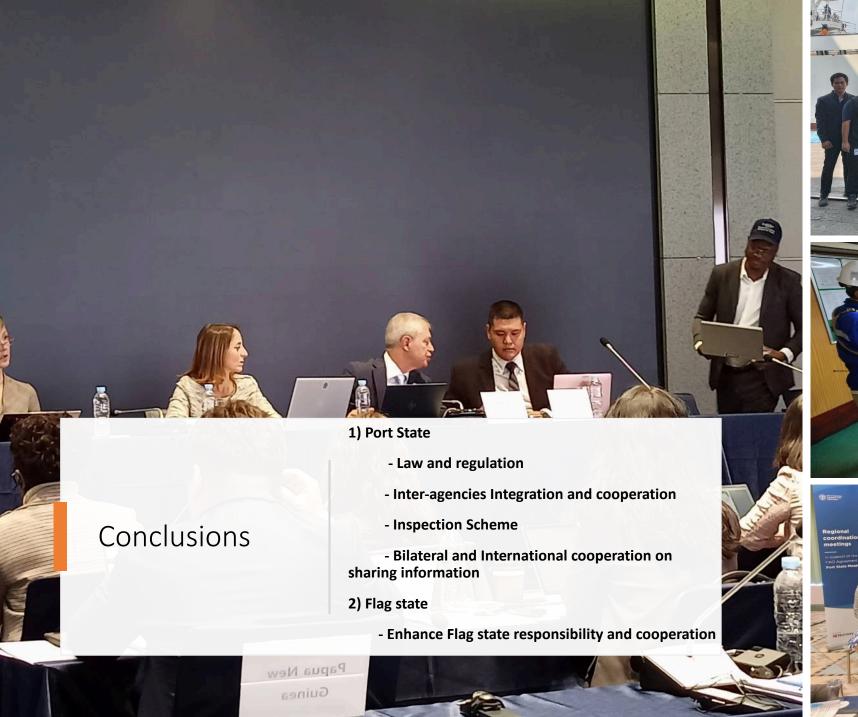
Each Party shall ensure that its inspectors are properly trained taking into account the guidelines for the training of inspectors in Annex E. Parties shall seek to cooperate in this regard.



PSMA (Role of flag States)

Article 20 Role of flag States

Each Party shall require the vessels entitled to fly its flag to cooperate with the port State in inspections carried out pursuant to this Agreement.









3. Successful cases

9 Vessels that claimed to be Bolivian flag and used fake documents (All 9 vessels have been listed in IOTC IUU Vessels List)

Rejection of the 46 containers which contained fish from the 4 IOTC IUU fishing vessels (Rejected 1,310 tones of IUU catches)

The Wisdom Sea Reefer which illegally transshipped fish (Wisdom Sea Reefer has been listed in IOTC IUU Vessels List and delisted due to complete scrapping)

Denied to port entry of 1 Carrier vessel according to insufficient information to prove FADs activities



Q&A

